## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

IN RE:

**S** CASE NO. 17-10694

RICKY AROCHA DEBTOR § §

CHAPTER 13

## MOTION PURSUANT TO 11 USC §362(c)(3) FOR CONTINUATION OF THE AUTOMATIC STAY AS TO ALL CREDITORS AND TO ALL ESTATE PROPERTY

NOW COMES the debtor, by and through undersigned counsel, and pursuant to 11 USC 362(c)(3) request that the stay be extended throughout the pendency of the chapter 13 case absent future order from the court and as such shows the court as follows:

- 1. The debtor filed the above captioned case on June 5, 2016.
- 2. The debtor filed a prior chapter 13 case [Case number 16-10006] on January 4, 2016. The case was dismissed on September 15, 2016.
- 3. The debtor owns real property located at 6412 Auburn Drive, Austin, TX 78723, subject to a deed of trust to Bank of America.
- 4. The debtors' current case is filed in good faith because:
  - a. In the previous case, the debtor fell behind with the trustee payments and the case was dismissed. The debtor feels he now has the income to fully fund the plan and remain current and fund the Chapter 13 Plan payments.

WHEREFORE the debtor requests that pursuant to 11 USC 362(c)(3) the court order that the Automatic Stay be Continued through the pendency of the chapter 13 case absent future orders from the court and for such other and further relief as the court deems appropriate and just.

/s/Elizabeth Hickson Hickson Law, P.C. 4833 Spicewood Springs Road #200 Austin, TX 78759 Bar No. 09586000

Tel: 512-346-8597 Fax: 512-346-2047

#### **CERTIFICATE OF SERVICE**

The foregoing Debtor's Motion to be served on the following parties, by mailing a copy by depositing it in the United States Mail, by First Class Mail, in a properly addressed envelope with adequate postage thereon.

Deborah Langehennig Chapter 13 Trustee Served Electronically

Ricky M. Arocha 6412 Auburn Drive Austin, TX 78723

ALL PARTIES ON THE ATTACHED MAILING MATRIX

/s/ Elizabeth June Hickson Elizabeth June Hickson Attorney for debtor Label Matrix for local noticing 0542-1 Case 17-10694-tmd Western District of Texas Austin Mon Jun 12 13:46:57 CDT 2017 Austin Public Library 800 Guadalupe Austin, TX 78701-2314

City of Austin PO Box 2267 Austin, TX 78768-2267

Grande Communications Credit Protection Assoc PO Box 02068 Dallas, TX 75380

Mackie Wolf Zientz & Mann, P.C. 14160 North Dallas Parkway #900 Dallas, TX 75254-4314

Texas Workforce Commission Collections Department 101 E. 15th St. Travis Bldg. #200 Austin, Tx. 78778-0001

Deborah B. Langehennig Chapter 13 Trustee 6201 Guadalupe St. Austin, TX 78752-4011

End of Label Matrix
Mailable recipients 20
Bypassed recipients 0
Total 20

United States Trustee (SMG113) United States Trustee 903 San Jacinto Blvd, Suite 230 Austin, TX 78701-2450

Bank of America Home Loan Servicing P.O. Box 5170 Simi Valley, CA 93062-5170

Compass Bank P.O. Box 10566 Birmingham, AL 35296-0001

Hickson Law, P.C. 4833 Spicewood Springs Suite 200 Austin, tx 78759-8436

Municipal Services Bureau 5912 Balcones Dr., Ste. 100 Austin, TX 78731-4310

United States Trustee - AU12 United States Trustee 903 San Jacinto Blvd, Suite 230 Austin, TX 78701-2450

Elizabeth June Hickson 4833 Spicewood Springs Rd., #200 Austin, TX 78759-8436 U.S. BANKRUPTCY COURT 903 SAN JACINTO, SUITE 322 AUSTIN, TX 78701-2450

Bank of America, N.A. 600 Wilshire Blvd. 4th Floor Los Angeles, CA 90017-3215

FHA/HUD 800 Dolorosa Street San Antonio, TX 78207-4559

Leon J. Barish 1409 West Sixth Street Austin, TX 78703-5140

Texas Tollways 12719 Burnet Road Austin, TX 78727-4207

William T. Peckham 1104 Nueces St., Ste 104 Austin, TX 78701-2106

Ricky M. Arocha 6412 Auburn Drive Austin, TX 78723-3307

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IN RE:

§

**CASE NO. 17-10694** 

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**CHAPTER 13** 

# ORDER EXTENDING AUTOMATIC STAY AS TO ALL CREDITORS

It is hereby ordered that the Automatic Stay as to all creditors is extended until further order of the court.

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Hickson Law, P.C. Elizabeth Hickson 4833 Spicewood Springs Ste 200 Austin, TX 78759

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